

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

**RACHELLE SHAW and MARKELL
HAREWOOD, Each Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 5:22-cv-396-M-KS

**OAKCITY PROTECTION, LLC
ALPHA DEFENSE GROUP CORP.,
AUSTIN TAYLOR and JASON YOUNG**

DEFENDANTS

RESPONSE TO SHOW CAUSE ORDER

Plaintiff, by and through her undersigned attorney of the Sanford Law Firm, PLLC, for her Response to Show Cause Order – ECF No. 14, states and alleges as follows:

A. Oak City Protection, LLC

Plaintiff served Defendant Oak City Protection, LLC, on October 25, 2022. See Exhibit 1, Proof of Service. To date, Defendant Oak City Protection, LLC, has not answered or otherwise responded to Plaintiff's Complaint. Accordingly, Plaintiff intends to move this Court for an entry of default.

B. Alpha Defense Group Corp.

Plaintiff served Defendant Alpha Defense Group Corp., on February 28, 2023. See Exhibit 2, Proof of Service. To date, Defendant Alpha Defense Group Corp., has not answered or otherwise responded to Plaintiff's Complaint. Accordingly, Plaintiff intends to move this Court for an entry of default.

C. Austin Taylor

Plaintiff served Defendant Austin Taylor on October 25, 2022. See Exhibit 3, Proof of Service. To date, Defendant Austin Taylor has not answered or otherwise responded to Plaintiff's Complaint. Accordingly, Plaintiff intends to move this Court for an entry of default.

D. Jason Young

To date, despite diligent and repeated attempts at service, Plaintiff has been unable to serve individual Defendant Jason Young. At this time, Plaintiff does not have good reason to believe that additional attempts at service would be successful in getting individual Defendant Jason Young served in a reasonable amount of time. As such, Plaintiff is not opposed to dismissal without prejudice of individual Defendant Jason Young.

Respectfully submitted,

**RACHELLE SHAW, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFF**

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